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WERNER K. HARTENBERGER

July 19, 1993

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JUL 19 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Re: The Use of N11 Codes and Other Abbreviated Dialing
Arrangements
CC Docket No. 92-105
Oral Ex Parte Presentation

Dear Mr. Caton:

This letter is being submitted in accordance with Section 1.1206 of the Commission's Rules to report an oral ex parte presentation regarding the above-referenced proceeding made on behalf of Cox Enterprises, Inc. by the undersigned and J.G. Harrington to Peyton L. Wynns of the Commission's Common Carrier Bureau on this date. During this presentation, issues relating to the progress of the Cox Enterprises N11 experiment in Florida, the status of N11 matters in Georgia and the use of uniform dialing arrangements for relay services were discussed.

In connection with these discussions, a copy of Cox's report to the Florida Public Service Commission on its N11 experience was provided to Mr. Wynns. In accordance with the requirements of Section 1.1206(a)(1) of the Commission's Rules, two copies of that report are being submitted as an attachment to this letter.

In accordance with the requirements of Section 1.1206(a)(2) of the Commission's Rules, an original and one copy of this letter are being submitted to the Acting Secretary and a copy of this letter is being submitted to Mr. Wynns.

Respectfully submitted,


Werner K. Hartenberger

WKH/bbv
Attachments

No. of Copies rec'd
List A B C D E

cc (w/o encl.): Mr. Peyton L. Wynns

07/

EX PARTE OR LATE FILED
BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION

In Re: Request for Approval
of Tariff Filing to Introduce
N11 Service by BELLSOUTH
TELECOMMUNICATIONS, INC. d/b/a
SOUTHERN BELL TELEPHONE AND
TELEGRAPH COMPANY N11 TARIFF
FILING

Petition of Palm Beach Newspapers,
Inc., News and Sun-Sentinel Company,
and Cape Publications, Inc. for
extended local 976 or equivalent
service throughout the service
area of Southern Bell Telephone
and Telegraph Company

In Re: Petition to require local
exchange carriers to assign an
abbreviated N11 dialing code by
INFODIAL, INC.

DOCKET NO. 920962-TL

DOCKET NO. 910049-TL

DOCKET NO. 920913-TL

FILED: 06/30/93

RECEIVED

JUL 19 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

PALM BEACH NEWSPAPERS, INC.'S
REPORT ON POSTLINES/511

Palm Beach Newspapers, Inc. (PBNI) a wholly owned subsidiary of Cox Enterprises, Inc., hereby submits its prehearing report on its experience under the experimental N11 tariff of Southern Bell Telephone and Telegraph Company (Southern Bell).

INTRODUCTION

In Order No. PSC-92-1272-FOF-TL, the Commission declined to give final approval to Southern Bell's proposed N11 tariff, but instead set for hearing disputed issues over the use of N11 service. Nevertheless, the Commission did approve for a two year period an experimental tariff under which Southern Bell would provide N11 service to PBNI. This relief was afforded PBNI in

recognition of the "prolonged history" of PBNI's efforts to obtain "a suitable service" as a platform for its audiotext services. In addition, the Commission contemplated that PBNI's experience would be useful to the Commission in evaluating the potential uses of N11 service.

This report is submitted to facilitate that evaluation. It covers the first 90 days of operation for PostLines/511, and includes three parts: a narrative summary and two appendices. Appendix I is the PostLines/511 directory, which contains a complete listing of the service's permanent features and explanations of how to use the service; Appendix II is the "Customer Service Manual and Guide to Protecting Customer Phone Numbers" which states PBNI's service policies and provides clear explanations of how typical problems are handled.

A New Service

PBNI uses Southern Bell's N11 service as the access and billing platform for "PostLines/511," the audiotext service of the Palm Beach Post, which was inaugurated on March 7, 1993. Although PBNI had provided an earlier audiotext service, PostLines/511 was and is a new creation. In bringing PostLines/511 on-line, PBNI's focus was to ensure a trouble free, easily understood service that enhanced the Palm Beach Post through better service to its readers.

process of turning up its N11 service, PBNI itself was installing new customer premise audiotext equipment. Not only did PBNI face the task of beginning a new audiotext service, but also on new equipment. PBNI had to ensure that installation of the CPE was complete and that this system was debugged. Part of the debugging process involved bombardment of the system with internal phone calls, trying to find anything and everything that could go wrong. This sustained attempt to identify problems lasted from late January until March 6, 1993.

New Features

The second concurrent phase involved determining what the features or content of PostLines/511 would be. Importantly, content decisions were not made to maximize call volume, but rather to ensure quality of service to the customer. In determining what content to include, PBNI considered the following:

- o what features would benefit the reader, thereby enhancing the newspaper?
- o what features would likely work right the first time? and
- o what features could be marketed to consumers without confusion?

Today PostLines/511 provides 1,000 permanent and daily information categories. As already noted, the initial listing of permanent categories is provided in the PostLines/511 directory. In addition, directories and references to 511 features are provided throughout the Palm Beach Post, including at the end of selected news stories. For example, an article on the President's

latest address might contain a reference to allow the reader to obtain a fax copy of the speech.

Consumer Education

The third phase was to develop a promotional plan. Again, as conceived by PBNI, the key purpose of promotional efforts was not simply to promote call volume, but rather to educate the consumer on what 511 service is and how to use it. Great care was taken to ensure that all promotional efforts were clear and informative.

Call Volume

From March 7, 1993 through June 7, 1993 PostLines/511 audiotext service received 57,320 calls by 511 access, and 6,680 calls by 900 access. Taken as a whole, PostLines/511 receives between 500 and 900 calls per day. The daily variation is mainly the result of call volume spikes, which in turn are caused by hot local topics. For example, early in the baseball season updates on the Marlins professional baseball games caused a flood of calls. The most popular routine topics include sports information, movie reviews, stock quotes and mortgage updates.

SERVICE CALLS, COMPLAINTS, AND REFUNDS

During this period, PostLines/511 also received through a separate seven digit number approximately 1300 service inquiries, of which only 49 involved refunds. Importantly, these were not 49 calls originally requesting refunds, but service calls in which refunds were made, often at PBNI's initiative. Stated as a percentage of the total 64,000 calls received by PostLines/511, PBNI has refunded less than 0.08 percent, or approximately 1 refund

for every 1,300 calls. Also, not one of these service calls involved complaints or concerns about confusion between 511, 411, and 911.

Service calls typically fall into three main categories: general questions, Non-PostLines/511 calls, and complaints and/or refund requests. The Customer Service Manual and Guide to Protecting Customer Phone Numbers provides a succinct explanation of how each type of call is handled. As reflected in the service manual, it is PBNI's intent to respond constructively to every service call.

In making refunds, PBNI uses a plain but effective method: it mails to the customer a dollar bill to reimburse the 35 cents, and to pay for the next two calls. As explained in the Service Manual, "Our refund policy is very simple: If a customer wants a refund, we give it to him."

Problems

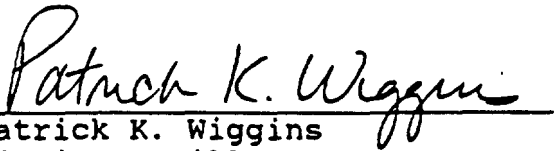
Although the introduction of PostLines/511 was not problem free, PBNI believes it achieved its initial objective of creating a completely new audiotext service that is reliable, easily understood, and inexpensive to use. PBNI also believes that it could not have achieved this goal if Southern Bell had not also demonstrated its proficiency at rolling out new products.

As this juncture, the main problem PBNI has with PostLines/511 is that not everyone within its subscription area can reach the service via 511. This problem exists because under the experiment, 511 access is provided only from PBNI's local dialing area, and not

from adjacent local dialing areas. If a Post subscriber calls from within PBNI's local dialing area access is via 511 and the charge is 35 cents for a five minute call. However, if a Post subscriber is calling from an adjacent area, access is via 900-990-9511, and the charge is 35 cents per minute.

This disparity causes at least two problems. First, 900 access represses call volume. Although the population within the Post's local dialing area and the total population within the adjacent areas are roughly the same, the call volume for local dialing area is more than eight times greater than the adjacent areas. Thus the repressive effect of 900 access is overwhelming. Second, the less desirable access afforded Post subscribers in these calling areas has triggered unacceptable resentment. PBNI therefore intends to seek 511 access to PostLines/511 from these adjacent areas as soon as possible.

Respectfully submitted this 30th day of June, 1993.


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Attorneys for Palm Beach
Newspapers, Inc.

CERTIFICATE OF SERVICE

Dockets Nos. 920962-TL, 910049-TL, 920913-TL

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by United States Mail, by hand-delivery (*), or by telecopier (**) to the following on this the 30th day of June, 1993.

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Marshall M. Criser, III*
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Tallahassee, Florida 32301

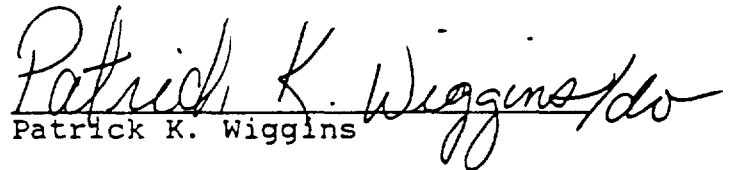
Charlie Beck
c/o The Florida Legislature
111 West Madison Street
Room 812
Tallahassee, Florida 32399

C. Dean Kurtz*
Central Telephone Company of
Florida
Post Office Box 2214
Tallahassee, Florida 32316

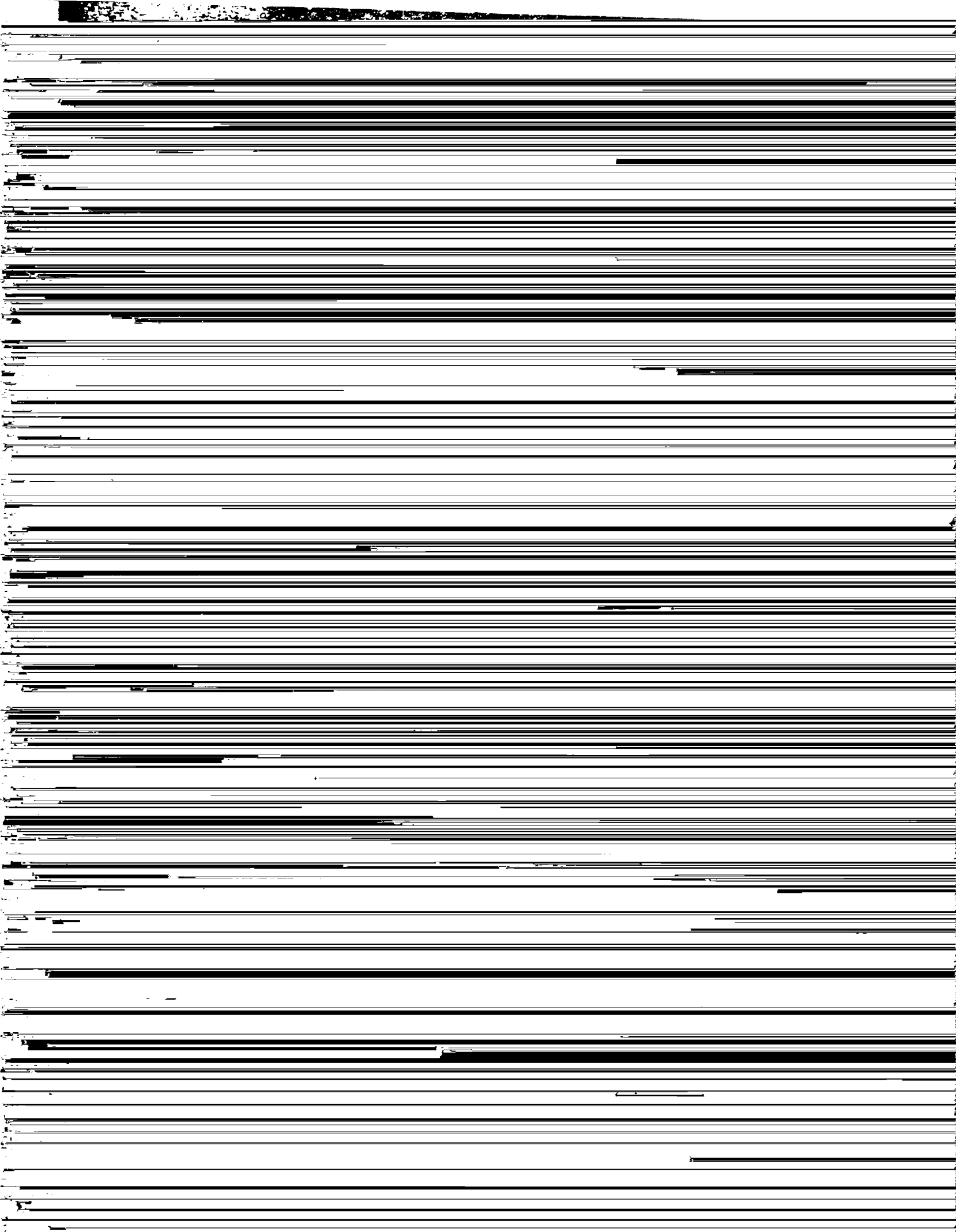
Alan N. Berg
United Telephone Company of
Florida
Post Office Box 5000
Altamonte Springs, FL 32716

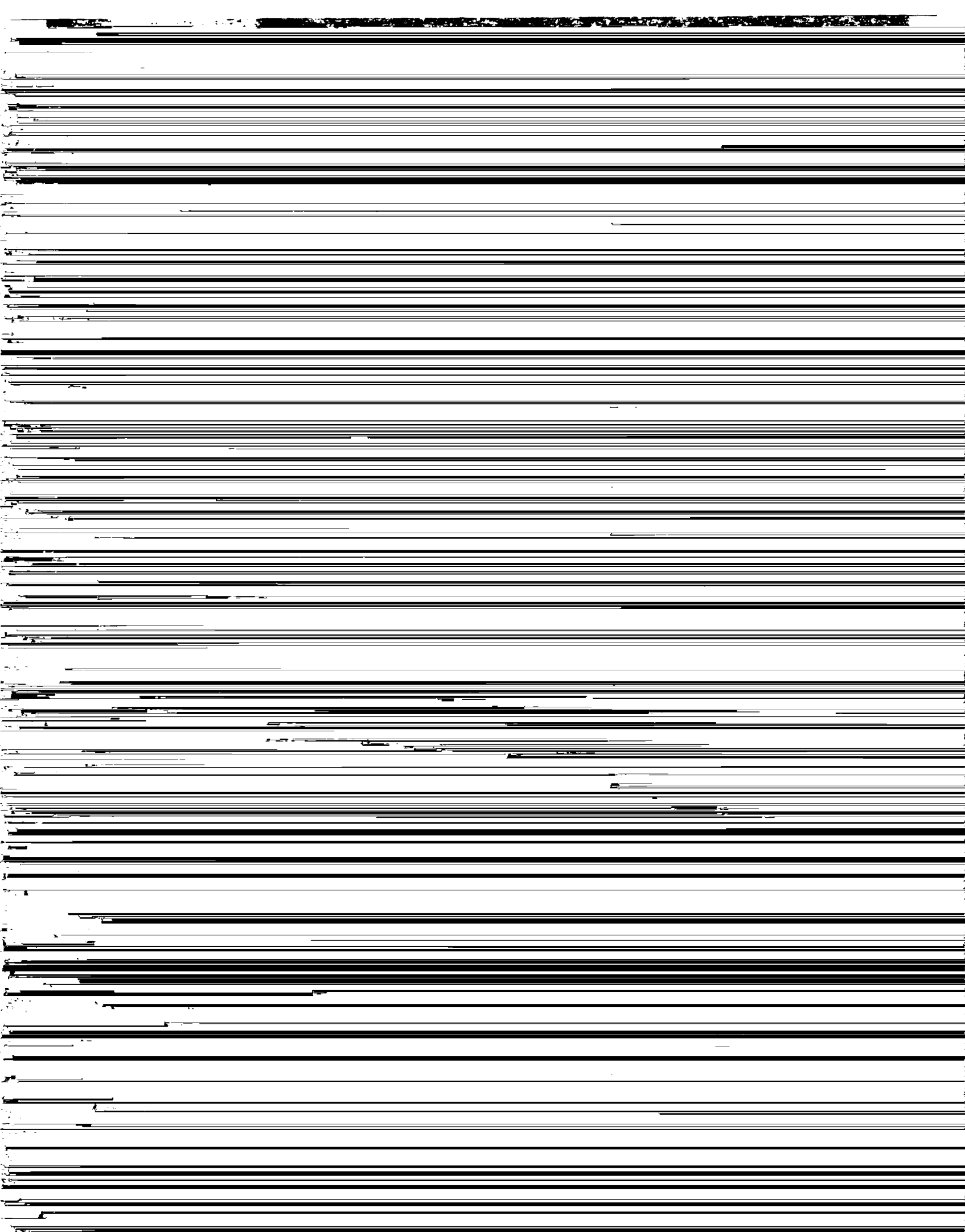
News and Sun-Sentinel
Company
200 East Las Olas Boulevard
Ft. Lauderdale, FL 33301-
2293

Jan Masek
The Print Group, Inc.
302 North La Brea Avenue
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Patrick K. Wiggins

APPENDIX I
POSTLINES/511 DIRECTORY





INDEX TO LINES

U.S. & World News	4
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WHAT POSTLINES/511 NUMBER DO I CALL?

If you're calling from Tequesta/Jupiter south through Boynton Beach and west through Wellington/Royal Palm Beach,

Dial 511

That's it. Those three little numbers get you 5 minutes access to PostLines/511.

This 5-minute call costs 35¢ and will be billed to your monthly Southern Bell statement.

If you're calling from outside the area described above,

Dial (900) 990-9511

You can use this number anywhere in the country. Calls to this (900) number cost **35¢ PER MINUTE** and will be billed to your monthly Southern Bell statement.

HERE'S HOW

POSTLINES/511 WORKS.



ASSOCIATED PRESS

reporters take you to the scene of news all around the world. Hear eye-witness accounts, the sounds of battle and debate from the halls of Congress.



The Palm Beach Post

NEWS LINES

1001 AP 5-MINUTE REPORT

You see the news through the eyes of Associated Press reporters around the globe and listen to people on the scene. Updated at the top of every hour, every day. Length: 5 minutes.

1002 AP 2-MINUTE UPDATE

A quick summary of national and world events updated every 30 minutes Monday through Friday. Length: 2 minutes.

1111 BREAKING NEWS

This takes over where the two lines above leave off. Updated as needed. If there is a major news event (airliner down, a traffic tie-up on I-95, or a boil-water order in a local neighborhood) this line will update you as quickly as we learn about it. Length: Varies.

1004 CANADIAN UPDATE

The latest stories from around Canada updated three times a day, seven days a week. Length: Under 5 minutes.

1005 INTERNATIONAL UPDATE

During the afternoon and evening this service will go beyond the AP updates to tell you what's occurring in Israel, Asia, Australia, Europe, South America and every other part of the world. In the mornings, this category will emphasize those world events that did not get in the morning newspaper, especially events that occurred over night. Length: Under 5 minutes.

1010 FLORIDA NEWS UPDATE

During the afternoon and evening this line will provide the breaking state news of the day. In the mornings, this line will have state news that didn't make it in today's newspaper, especially news that occurred overnight. Length: Under 5 minutes.

1021 FLORIDA LEGISLATURE UPDATE

During the afternoon and evening this line will provide the breaking news of the day from the Legislature. Length: Under 5 minutes.

KEY VOTES

How did your elected officials in Washington and Tallahassee vote this week? Closer to home, what votes did your county commissioner cast? Updated by 6 a.m. every Saturday. Length: Under 5 minutes.

1007 U.S. Senate and House

1016 Florida Senate and House

1056 Palm Beach County Commission

1071 Solid Waste Authority

1061 Martin County Commission

1066 St. Lucie County Commission



1011 WHILE YOU SLEPT

Updated by 6 a.m., Monday through Friday, this unique line will include the important stories from around the nation and the world that developed in the early mornin



**FREE
LOCAL
REPORTS**

WDTN NewsChannel 5

4100 U.S. AND INTERNATIONAL WEATHER

This helpful service for travelers — or just the curious will provide the **CURRENT** temperature and conditions 43 U.S. cities, 18 Canadian cities and 16 foreign cities. When you call this **LINE**, you'll be asked to select U.S. Canadian or foreign, and then you'll enter the first three letters of the name of the city you're interested in.

UNITED STATES:

ALLentown
ANCHorage
ATLanta*
ATLantic City*
BALtimore
BOSTon
CHARlotte
CHICago
CINCinnati
CLEveland
COLumbus
DAYton
DALlas
DENver
DETroit
GRAnd Rapids
HONolulu
HOUSTon

CANADA:

ALBerta Provincial
B.C. Provincial
CALgary
CHARlottetown
EDMonton
HALifax
HAMilton
KITchener
MONtreal
ONTario Cottage Coun
OTTawa
QUEbec City
REGina
ST. John's
TORonto
VANcouver
WINdsor
WINipeg



INSTANT FORECASTS

Find out the weather conditions in 43 U.S. cities, 18 Canadian cities and 16 international cities with a call to PostLines/511.

LOCAL WEATHER

For free* WPTV NewsChannel 5 local weather forecast call (407) 820-4567, line 5555. Updated every 3 hours 6 a.m. to midnight or as needed due to severe weather. Forecasts cover Palm Beach, Martin, St. Lucie, Indian River and Okeechobee counties.

* This service is free from Tequesta/Jupiter south to Boynton Beach and west to Wellington and Royal Palm Beach. Outside this area, normal long distance charges apply.

UPCOMING NEWS LINES

The PostLines/511 services listed in this directory are just the beginning. PostLines/511 will constantly be adding new services for you. Use the coupon on page to tell us what you'd like The Palm Beach Post to add. Here's a line we're working on now:

WHAT DO YOU THINK? — Can't wait to voice your opinion about some topical and timely issue? Instead of sitting down and writing a letter and paying the 29 cent postage, call PostLines/511 and record your comments. A 511 editor will listen to all the recorded "letters" and select the most interesting, thoughtful and insightful to be included on a special line that all PostLines/511 callers can listen to.

LOCAL NEWS LINES

1051 PALM BEACH COUNTY NEWS UPDATE

The top stories of the day that will appear in tomorrow's Palm Beach Post. Updated Monday through Friday at 5 and 6 p.m. Length: 2 to 3 minutes.

URGENT



BUSINESS LINES FOR INVESTORS

Some BUSINESS LINES are available by telephone or by fax machine. We recommend that you try to receive



2441 by phone / 9111 by fax
BEST SENIOR CITIZEN PACKAGES
AND FREE CHECKING ACCOUNTS

Checking account rates, fees, minimums and other requirements from the 10 largest asset banks and thrifts in Palm Beach, Martin and St. Lucie counties. Updated by the Bank Rate Monitor every other Friday at 6 p.m. Available by phone or fax, but fax is recommended.



24-HOUR STOCK QUOTES

are available through PostLines/511. NYSE, American Stock Exchange and NASDAQ quotes are delayed 15-20 minutes. Mutual Funds and Money Funds are available at the end of the trading day. After markets close, the final figures are available until trading renews.



The Palm Beach Post

2066 STOCK MARKET UPDATE

One-minute summary of stock market activity by Dow Jones Voice Information Network®. First updated at 9:50 a.m., then at :15 and :45 minutes past each hour, with a closing report by 4:30 p.m.

2026 DOW JONES AVERAGES

Dow Jones industrial, transportation, utility and composite averages. Updated at 9:45 a.m., then every half hour. Length: 30 seconds.

2056 OTC UPDATE

Summary of activity on over-the-counter stock market by Dow Jones. Updated hourly starting at 10 a.m. each trading day. Length: 30 seconds.

2051 NYSE MOST ACTIVES

Hourly statistical summary of activity on the New York Stock Exchange produced by Dow Jones. Includes volume, advancers vs. decliners, NYSE Composite Index and a listing of most-active stocks. Updated hourly starting at 10:30 a.m. Length: 30 seconds.

2031 FOREIGN STOCK MARKETS

Tokyo, London and Frankfurt markets updated several times during overseas trading days by Dow Jones. Length: 30 seconds.

2006 BOND MARKET UPDATE

Dow Jones summary of trading activity on the bond market, focusing on popular U.S. Treasury securities. Updated hourly, beginning at 9 a.m. Length: 30 seconds.

2036 KEY RATES AND PRICES

Dow Jones summary of yields on major financial instruments, including federal funds, 3-month Treasury bills, 10-year Treasury notes and the long bond. Updated every 30 minutes beginning at 9:10 a.m. Length: 30 seconds.

2071 U.S. DOLLAR

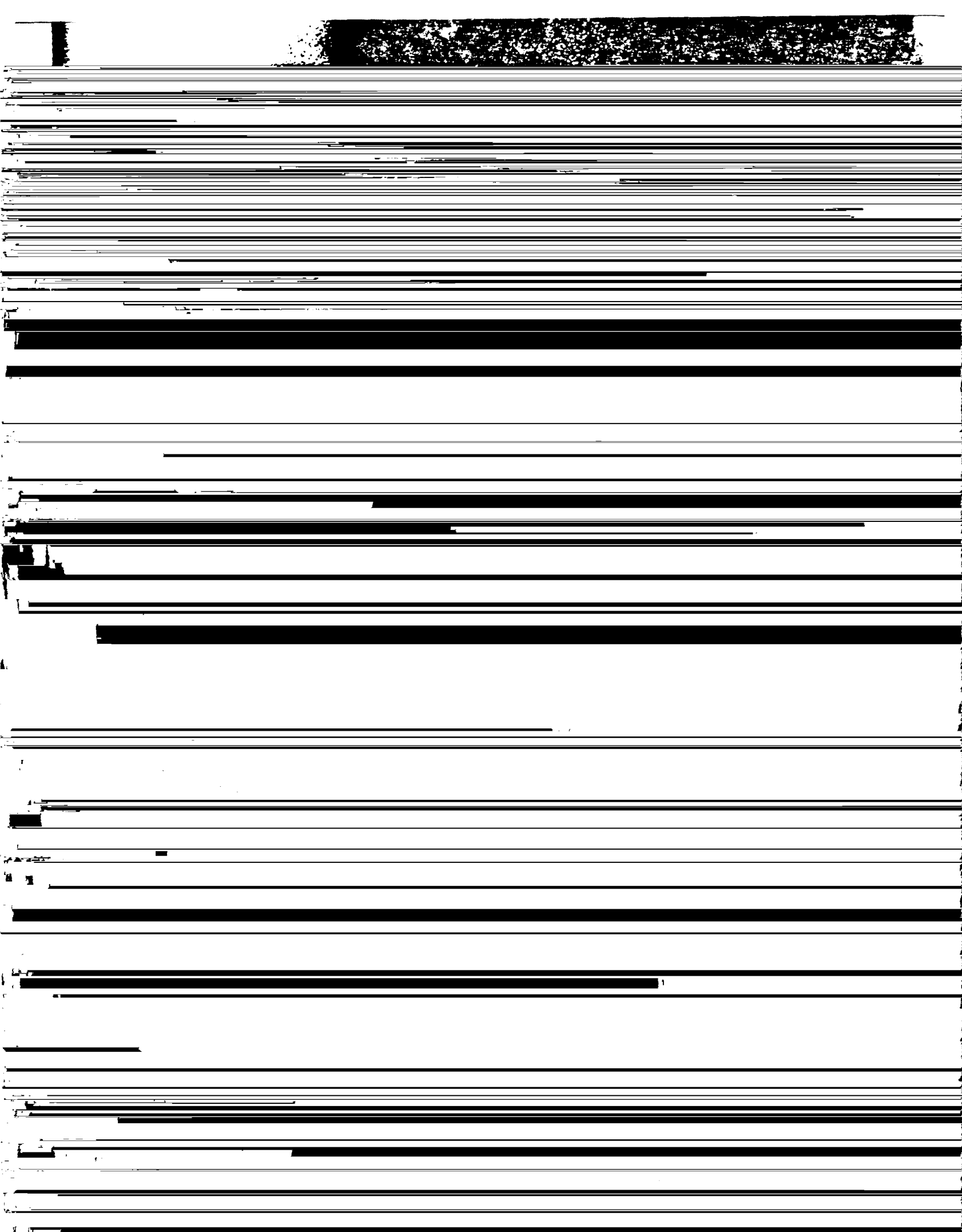
Dow Jones summary of trading against major currencies. Updated at 8:00 a.m., then hourly by 8:45 a.m. through 5:45 p.m. Length: 30 seconds.

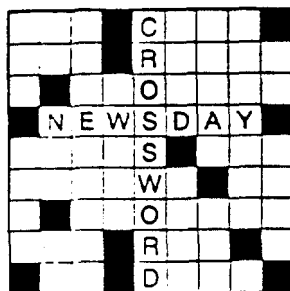
2046 NEW YORK FOREIGN EXCHANGE PRICES

Dow Jones summary of major foreign currencies quoted against the U.S. dollar. Updated hourly at a few minutes past the hour, 8 a.m. - 5 p.m. Length: 30 seconds.

2021 COMMODITY FUTURES UPDATE

Dow Jones summary of trading on the nation's major futures exchanges. Updated hourly starting at 10:15 a.m. Length: 30 seconds.





FAXED FEATURES

Get four comic strips,
two crossword puzzles
and for several other

- 2626** Single, Widowed, Married . . . the IRS Has a Filing Status for You
- 2631** What's Yours and What's Uncle Sam's
- 2636** Uncle Sam Is Interested in Your Interest
- 2641** April 15th May Be a Little Easier for Some Business Owners
- 2646** Capital Gains and Losses
- 2651** Some Social Security Payments Are Taxable
- 2656** Employee Business Expenses
- 2661** Sheltering Income for Your Retirement
- 2666** Alimony and Taxes
- 2671** Tax Breaks for the Disabled and Seniors
- 2676** Figuring Out Whether To Itemize
- 2681** Medical Expenses
- 2686** Cutting Taxes With Your Taxes
- 2691** You May Be Paying Too Much in Taxes
- 2696** Charity Is Deductible
- 2701** If Your House Was Hit by a Storm, There's a Tax Break
- 2706** New Tax Tables
- 2711** The Kiddie Tax Has a Big Bite
- 2716** Child and Dependent Care Deductions
- 2721** Social Security and Medicare for the Self-Employed